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Attorneys for  
Romanov Group LLC

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**SANTA ANA DIVISION**

In re  
CADUCEUS PHYSICIANS MEDICAL  
GROUP, a Professional Medical Corporation,  
dba CADUCEUS MEDICAL GROUP,

Debtor.

Case No.: 8:24-bk-11945-TA

(Chapter 11)

**ROMANOV GROUP LLC'S OMNIBUS  
LIMITED OPPOSITION TO INTERIM  
FEE APPLICATIONS OF THE  
DEBTORS' PROFESSIONALS [DKTS.  
311, 312, 315]**

**Hearing:**

Date: May 13, 2025  
Time: 11:00 a.m.  
Ctm: 5B  
Place: 411 W. Fourth Street  
Santa Ana, CA 92701

Romanov Group LLC (the "Landlord") respectfully submits this omnibus limited opposition to the Interim Fee Applications (collectively, the "Applications") of (1) Marshack Hays Wood LLP, General Counsel for Debtors for the period of August 1, 2024, through March 31, 2025 (the "Marshack Application"); (2) Grobstein Teeple LLP – Howard B. Grobstein, First Interim, Chief Restructuring Officer for Debtor for the period of August 1, 2024, through March 31, 2025; (3) ArentFox Schiff



LLP, Special Healthcare Counsel for Debtor for the period of September 6, 2024 through April 9, 2025. Any reply must be filed with the court and served on the Landlord not later than 7 days prior to the hearing on the Application.

#### LIMITED OPPOSITION

Landlord does not object to the interim allowance of the Debtors' professional fees and expenses, nor the application of retainers. However, the Applications do not provide sufficient information for the Court to authorize the payment of estate funds.

The appropriateness of the allowance and payment of fees on an interim basis in any particular case will depend on several factors:

1. The current availability of funds from which fees can be disbursed;
2. The existence and amount of other accrued administrative obligations of the same or higher priority that might exhaust available funds;
3. The continuing need for funds to pay the necessary administrative expenses likely to be incurred in completing the administration of the case; and
4. Inability to file a final fee application in the near future.

*In re Commercial Consortium of Cal.*, 135 B.R. 120, 124-25 (Bankr. C.D. Cal. 1991).

Per the Marshack Application, the Debtors plan to pay the professionals from approximately \$1.8 million in ERTC funds that they expect to receive in the near future, rather than cash on hand or sale proceeds.<sup>1</sup> However, the Applications offer no evidence that the ERTC funds will be sufficient for the estate to pay accrued and future administrative claims, with or without the anticipated sale proceeds. It is also unclear whether any secured creditor may assert an interest in the ERTC funds or whether the Debtor is likely to receive all of the claimed ERTC funds or just a portion. The Debtors presumably expect all of that to come into focus later, but the Court will have already authorized the Debtors to make full payments to professionals.

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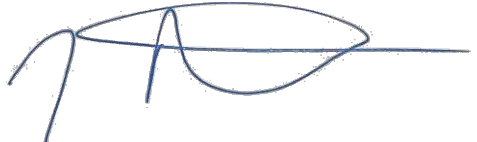
<sup>1</sup> Landlord is in the advanced stages of discussion with the court-approved back-up bidder, and its lease was subject to the Debtor's Motion to Extend Deadline to Assume or Reject Unexpired Leases of Nonresidential Real Property, which was voluntarily withdrawn on April 25, 2025.



1 Instead, Landlord respectfully requests that the Court only authorize payment to the extent that  
2 the Debtors and professionals can show that such funds will not be necessary to pay other  
3 administrative expenses *pro rata*.

4  
5 DATED: April 29, 2025

G&B LAW, LLP

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8 By:   
9 JEREMY H. ROTHSTEIN, ESQ.  
10 Attorneys for Romanov Group LLC  
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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
16000 Ventura Blvd., Ste. 1000, Encino, CA 91436

A true and correct copy of the foregoing document entitled (specify): **ROMANOV GROUP LLC'S OMNIBUS LIMITED  
OPPOSITION TO INTERIM FEE APPLICATIONS OF THE DEBTORS' PROFESSIONALS [DKTS. 311, 312, 315]** be  
served or was served in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)** – Pursuant to controlling General  
Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On April 29,  
2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following  
persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Samuel Mushegh Boyamian** samuel@marguliesfaithlaw.com,  
Angela@MarguliesFaithLaw.com; Vicky@MarguliesFaithLaw.com; Amber@MarguliesFaithLaw.com
- **Christopher Crowell** ccrowell@hrhlaw.com
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- **Jeremy Faith** Jeremy@MarguliesFaithlaw.com,  
Angela@MarguliesFaithLaw.com; Vicky@MarguliesFaithLaw.com; Amber@MarguliesFaithLaw.com
- **M Douglas Flahaut** df@echoparklegal.com
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☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:** On April 29, 2025, I served the following persons and/or entities at the last known  
addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope  
in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a  
declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for  
each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on April 29, 2025, I served the following  
persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service  
method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal  
delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

PER JUDGE ALBERT'S PROCEDURES, THE  
REQUIREMENT OF LBR 5005-2(D) TO PROVIDE  
JUDGES COPIES IS SUSPENDED AT THIS TIME.

VIA EMAIL: DEBTOR'S CHIEF  
RESTRUCTURING OFFICER  
HOWARD GROBSTEIN  
hgrobstein@gtllp.com

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

April 29, 2025

Matthew J. Bowes

*Date*

*Printed Name*

*Signature*

